

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
PROFESSIONAL OFFSHORE OPPORTUNITY
FUND, LTD., a company registered under the laws
of the British Virgin Islands

Docket No. 1:11-cv-4321(LAK)
ECF

-against-

Plaintiff(s),

NOTICE OF MOTION

HUIFENG BIO-PHARMACEUTICAL
TECHNOLOGY, INC., a Nevada Corporation

Defendant(s)

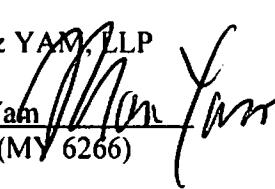
-----X

PLEASE TAKE NOTICE that upon the Declaration of Man Yam, dated October 21, 2011, the exhibits attached thereto; the accompanying Memorandum of Law dated October 21, 2011; and upon all the papers and proceedings had herein, defendants, HUIFENG BIO PHARMACEUTICAL TECHNOLOGY, INC. will move this Court, before the Honorable Lewis A. Kaplan, at the United States Courthouse for the Southern District of New York located at 500 Pearl Street, New York, New York, 10007, on November ___, 2011, for an order pursuant to 28 U.S.C. §1404(a) transferring this action to the United States District Court for the Eastern District of New York, together with such other relief as the Court may deem just and proper, on the grounds that this action should have been brought there, and the balance of convenience and justice favors transfer.

Pursuant to local rule 6.1(b) of the Southern District of New York, plaintiff's opposition to this motion shall be served by November 4, 2011 and defendant's reply, if any, shall be served by November 11, 2011.

Dated: New York, New York
October 21, 2011

BERNARD & YAM, LLP

By: /s/ Man Yam 
Man C. Yam (MY 6266)

401 Broadway, Suite 1708
New York, NY 10013
(212) 219-7783

To:

SULLIVAN & WORCESTER LLP
Andrew T. Solomon (AS 9200)
Attorneys for Plaintiff
1290 Avenue of the Americas, 29 Fl.
New York, NY 10104
(212) 660-3000

BY ECF